

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION**

United States of America  
*ex rel.* ALEX DOE, Relator,

The State of Texas

*ex rel.* ALEX DOE, Relator,

The State of Louisiana  
*ex rel.* ALEX DOE, Relator,

Plaintiffs,

V.

Planned Parenthood Federation of America, Inc.,  
Planned Parenthood Gulf Coast, Inc., Planned  
Parenthood of Greater Texas, Inc., Planned  
Parenthood South Texas, Inc., Planned Parenthood  
Cameron County, Inc., Planned Parenthood San  
Antonio, Inc.,

Defendants.

CIVIL ACTION NO. 2:21-CV-  
00022-Z

Date: July 18, 2022

**AFFILIATE DEFENDANTS' MOTION TO COMPEL TO THE STATE OF TEXAS**

Defendants Planned Parenthood Gulf Coast, Inc. (“PPGC”), Planned Parenthood of Greater Texas, Inc. (“PPGT”), Planned Parenthood South Texas, Inc. (“PPST”), Planned Parenthood Cameron County, Inc. (“PP Cameron County”), and Planned Parenthood San Antonio, Inc. (“PP San Antonio”) (together, “Affiliate Defendants”) respectfully move the Court pursuant to Federal Rule of Civil Procedure (“FRCP”) 37 for an order overruling discovery objections asserted by the State of Texas (“Texas”) and compelling Texas’s production of complete written

responses and responsive documents in response to Affiliate Defendants' Interrogatories and Requests for Production (collectively, "Discovery Requests"). In support of their Motion, Defendants respectfully refer the Court to their Brief in Support.

WHEREFORE, Affiliate Defendants request that this Court should overrule Texas's objections to interrogatories 2, and 4-18, as well as requests for production 3, 4, 6, 9-18, 21-39, 41-43, and 45 and order Texas to provide complete verified responses and produce all responsive documents. This Court should also order Texas to produce a privilege log for any of its assertions of privileges.

Dated: July 18, 2022

Respectfully submitted,

ARNOLD & PORTER KAYE SCHOLER  
LLP

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and Planned Parenthood San Antonio*

**CERTIFICATE OF SERVICE**

I hereby certify that on July 18, 2022, the foregoing document was electronically filed with the Clerk of Court using CM/ECF.

*/s/ Tirzah S. Lollar*

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Tirzah S. Lollar

**CERTIFICATE OF CONFERENCE**

On July 6 and July 7, in accordance with Local Rule 7.1(b), counsel for Defendants certify that they conferred with counsel for Relator and counsel for Texas regarding the relief requested in this motion. Several attorneys for Texas participated, but Raymond Winter from the Office of the Texas Attorney General spoke for Texas. Relator's counsel Andrew Stephens participated in the conference. Mr. Winter and Mr. Stephens stated that Relator and Texas are opposed.

/s/ Tirzah S. Lollar

Tirzah S. Lollar